

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Boston Edison Company )  
Cambridge Electric Light Company )  
Commonwealth Electric Company )

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D.T.E. 03-121

**NSTAR ELECTRIC FIRST SET OF INFORMATION REQUESTS TO THE  
DIVISION OF ENERGY RESOURCES**

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-DOER-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if DOER or its witness receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to “any and all”, “documentation”, “support”, and “justification” mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records,

microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact David Rosenzweig or Stephen August at (617) 951-1400 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

### **Information Requests**

#### **Information Requests Relating to the Pre-Filed Testimony of Mr. Pereira**

- NSTAR-DOER-1-1 Please provide copies of (1) any and all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Pereira to state and federal regulatory authorities from 1999 to the present; and (2) any and all transcripts of Mr. Pereira's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- NSTAR-DOER-1-2 Provide copies of any and all regulatory decisions addressing the issues covered by Mr. Pereira in testimony provided in response to Information Request NSTAR-DOER-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- NSTAR-DOER-1-3 Please identify all documents relied upon by Mr. Pereira in preparing this testimony. Please provide a copy of each identified document.
- NSTAR-DOER-1-4 Please provide a copy of any and all articles, papers, speeches or other reports prepared in whole or in part by Mr. Pereira addressing, distributed generation, standby rates and/or rate design.
- NSTAR-DOER-1-5 Referring to page 3, lines 23-24, please provide the basis for the statement that the response to Information Request DOER-

1-18 “assumes that the Companies were recovering their full cost of service under the current rates.”

NSTAR-DOER-1-6 Referring to page 3, lines 24-25, please provide the basis for the statement that the response to Information Request DOER-1-18 “assumes...that the customers with distributed generation impose new or different costs on the Companies.”

NSTAR-DOER-1-7 Referring to page 3, lines 30-32, and Mr. Periera’s statement that “there are studies that suggest that [DG] customers may be contributing a benefit to the system and thereby the non-standby customers by the presence of the on-site generation”, please provide the following:

- (a) a copy of any and all studies performed by Mr. Periera or DOER that assess the benefit of existing DG installations in the service territories of Boston Edison, Cambridge Electric or Commonwealth Electric;
- (b) a quantification of the amount of benefit from such DG installations in the service territories of Boston Edison, Cambridge Electric or Commonwealth Electric; and
- (c) data, studies, analyses and reports responsive to parts (a) and (b) above with respect to any other electric distribution company in Massachusetts.

Please identify all assumptions and data sources used in these studies.

NSTAR-DOER-1-8 Referring to page 4, line 8, please define the term “cost subsidization” and provide a copy of any and all documentation that support the definition.

NSTAR-DOER-1-9 Referring to page 4, line 18, please identify the “current standby rates” in effect for Boston Edison, Cambridge and Commonwealth. Provide a copy of any and all documents that relate to this response.

NSTAR-DOER-1-10 Referring to page 4, lines 26-28, please provide any studies performed by Mr. Periera or DOER that identify the degree to which the existing rates of any of the NSTAR Electric companies contain subsidies and which rate class(es) are subsidizing which other rate class(es).

NSTAR-DOER-1-11 Referring to page 4, lines 26-28, is it Mr. Periera’s contention that existing DG installations in the service territories of

NSTAR Electric companies are subsidizing non-standby customers? If so, please identify with specificity the DG installations where those subsidies are occurring in the NSTAR Electric service territories and the amount of the subsidies. Please provide all data, calculations and assumptions in support of these studies.

NSTAR-DOER-1-12 Referring to page 5, lines 10-11, please describe the manner by which the Company would account for and compute the "location-specific costs and any potential benefits from installation of DG."

NSTAR-DOER-1-13 Referring to page 5, lines 13-15, please describe the manner by which existing rates "account for location differences distribution-system costs." Provide a copy of any and all documents that relate to this response.

NSTAR-DOER-1-14 Referring to page 5, line 29 through page 6, line 1, is it Mr. Pereira's contention that the Company has asserted that "standby customers incur a greater share of fixed costs than non-standby customers or that standby customers are more fixed in nature"? If so, please provide the basis for that position, with citations to the record in this case.

NSTAR-DOER-1-15 Referring to page 7, lines 13-14, is it Mr. Periera's contention that properly designed standby rates should include terms that quantify and ascribe value to "societal benefits, such as, for instance, [reduced] environmental impacts of air emissions from centralized sources of generation"?

NSTAR-DOER-1-16 Referring to page 8, lines 6-7 and Exhibit DOER-AEP-2, please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in Exhibit DOER-AEP-2, including specific page numbers or other relevant citations for each of the citations listed under "Source URLs"; and (b) a copy (in paper and electronically) of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in Exhibit DOER-AEP-2.

NSTAR-DOER-1-17 Referring to page 8, lines 15-16, please identify any specific instance in 2002 or 2003 where the installation of a DG facility resulted in NSTAR Electric avoiding a monetary penalty under its SQI plan." Provide a copy of any and all documents that relate to this response.

- NSTAR-DOER-1-18 Referring to page 8, lines 25-27, please (a) provide any and all examples and (b) quantify the “high value” associated with the deployment of on-site generation. Provide a copy of any and all documents that relate to this response.
- NSTAR-DOER-1-19 Referring to page 9, line 28 through page 10, line 1, please provide any and all documents that describe, refer to or otherwise relate to the referenced “State Climate Change Action Plan.”
- NSTAR-DOER-1-20 Referring to page 10, lines 1-6, please provide a copy of any and all documents that describe, refer to or otherwise relate to the referenced “emissions regulations for distributed generation.”
- NSTAR-DOER-1-21 Referring to page 10, lines 25-26, please provide a complete copy of the referenced “report conducted by the Governor’s Task Force on Electric Reliability and Outage Preparedness.”
- NSTAR-DOER-1-22 Referring to page 12, line 1, please provide a copy of any and all documents that describe, refer to or otherwise relate to the referenced “analysis we conducted at DOER.”
- NSTAR-DOER-1-23 Referring to page 14, lines 24-30, please identify the specific exemptions that Mr. Periera believes should apply in Massachusetts to renewable sources of DG in relation to paying a distribution company’s tariffed standby rates.
- NSTAR-DOER-1-24 Referring to page 15, lines 8-9, do other costs and benefits to the customer associated with the installation of on-site generation affect the “barriers to wide scale deployment of DG”? If the answer is yes, has the DOER’s analysis accounted for such costs and benefits in determining the impact of NSTAR Electric’s proposed standby rates? Provide a copy of any and all documents that relate to this response.